

MARK D. LONERGAN (State Bar No. 143622)  
THOMAS N. ABBOTT (State Bar No. 245568)  
JASON M. JULIAN (State Bar No. 215342)  
jmj@severson.com  
SEVERSON & WERSON  
A Professional Corporation  
One Embarcadero Center, Suite 2600  
San Francisco, California 94111  
Telephone: (415) 398-3344  
Facsimile: (415) 956-0439

Attorneys for Defendant  
WELLS FARGO BANK, N.A.

MATHEW D. MELLEN (Bar No. 233350)  
SARAH SHAPERO (Bar No. 281748)  
MELLEN LAW FIRM  
One Embarcadero Center, Fifth Floor  
San Francisco, CA 94111  
Telephone: (415)315-1653  
Facsimile: (415)276-1902

Attorneys for Plaintiffs,  
BRET MACDONALD and AMALIA MACDONALD

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

BRET MACDONALD, an individual; and  
AMALIA MACDONALD, an individual,

Plaintiffs,

vs.

WELLS FARGO BANK, N.A. and  
DOES 1 through 50, inclusive,

Defendants.

Case No.: 3:14-CV-04970-HSG

**JOINT STIPULATION TO CONTINUE  
EXPERT DISCOVERY CUT-OFF  
DEADLINE; ~~PROPOSED~~ ORDER**

Action Filed: November 10, 2014  
Trial Date: May 1, 2016

Pursuant to the Civil Local Rules of the United States District Court for the Northern District of California, the parties, Plaintiffs BRETT MACDONALD and AMALIA MACDONALD ("Plaintiffs"), and Defendant WELLS FARGO BANK, N.A. ("Wells Fargo"), through their counsel of record, hereby stipulate to the following:

WHEREAS, on November 10 2014, Plaintiff filed her Complaint in the above-captioned court against Defendants;

WHEREAS, on April 12, 2016, the Court issued a Scheduling Order, setting Expert Discovery Cutoff for October 25, 2016;

WHEREAS, the Expert Discovery Cut-off deadline has been continued by the Court, following the parties stipulations, to January 27, 2017;

WHEREAS, Plaintiffs submitted their Initial Expert Disclosure on December 9, 2016, disclosing the intent to use an expert to testify at trial on Plaintiffs' behalf;

WHEREAS, Defendant designated a Rebuttal Expert on December 23, 2016;

WHEREAS, the medical experts that have been designated by both parties have schedules that have made it difficult to obtain deposition dates that work for all parties;

WHEREAS, Defendant's deposition of Plaintiff's Expert is currently scheduled for January 27, 2017 and Plaintiffs' deposition of Defendant's Expert is currently scheduled for February 20, 2017;

WHEREAS, the Parties request that the deadline to conduct all Expert Discovery be extended to February 20, 2017;

WHEREAS, no other deadlines in this matter will be affected by the requested continuance.

### **STIPULATION**

The parties stipulate to and request continuance of the Expert Discovery Cut-off Deadline to February 20, 2017.

Respectfully Submitted,

Dated: January 24, 2017

SEVERSON & WERSON

By: /s/ Jason M. Julian  
Jason M. Julian, Esq.  
Attorney for Defendant  
WELLS FARGO BANK, N.A.

Dated: January 24, 2017

MELLEN LAW FIRM

By: /s/ Sarah Shapero  
Sarah Shapero, Esq.  
Attorney for Plaintiffs  
BRETT MACDONALD and AMALIA  
MACDONALD

**ORDER**

This Court, having received and reviewed the stipulation of the parties referenced immediately above, and finding good cause therefore, pursuant to the stipulation of the parties;

The expert discovery cut-off deadline is continued to February 20, 2017.

**IT IS SO ORDERED.**

Dated: January 30, 2017

  
Honorable Haywood S. Gilliam, Jr.